

Fact Sheet



For Final Significant Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Significant Modification, and shall be considered a supplement to the original Fact Sheet corresponding with the issuance of the Title V operating permit issued on May 27, 2010.

Permit Number: **R30-05100113-2010**
Application Received: **October 29, 2012 and July 30, 2013**
Plant Identification Number: **051-00113**
Permittee: **CertainTeed Gypsum WV, Inc.**
Mailing Address: **9622 Energy Road, Proctor, WV 26055**

Permit Action Number: SM01

Revised: October 16, 2013

Physical Location:	10 Energy Road, Moundsville, Marshall County, West Virginia, 26041
UTM Coordinates:	516 km Easting • 4,408 km Northing • Zone 17
Directions:	The plant is located approximately 5 miles south of Moundsville on State Highway 2.

Facility Description

This is a gypsum wallboard forming facility. SIC code – 3275. Operations of the gypsum wallboard forming facility consist of receiving raw materials (primarily synthetic gypsum with some natural gypsum and additives), drying, grinding, and calcining the gypsum, followed by mixing with wet and dry additives to form slurry. The slurry is placed between two layers of paper to form the wallboard. The wallboard is dried, cut, and stacked for delivery.

This significant modification covers the following changes included in recent revisions of permit R13-2656 (D and E):

- installations of new silos (EU50 and EU52), bin feeders (EU51 and EU53), and a paper roll stand;
- processing of recycled material in Kettles K10 and K20
- facility mailing address change.

Emissions Summary

As the result of this modification, facility PTE will change as follows:

Regulated Pollutants	PTE change, TPE
Carbon Monoxide (CO)	+ 171.24
Particulate Matter (PM _{2.5})	+ 13.58
Particulate Matter (PM ₁₀)	+ 14.32
Total Particulate Matter (PM)	+ 27.90
<i>PM₁₀ is a component of TSP.</i>	

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 342.44 tons/yr of CO and 137.42 tons/yr of PM₁₀. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, CertainTeed Gypsum WV, Inc. is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This modification has been found to be subject to the following applicable rules:

Federal and State:	45CSR7	Fugitive dust, particulate matter, and visible emissions
	45CSR13	Permit for Construction
	45CSR16	Standards of Performance for New Stationary Sources Pursuant to 40CFR60
	45CSR30	Operating permit requirement.
	40 C.F.R. Part 60, Subpart OOO	Standards of Performance for Nonmetallic Mineral Processing Plants.

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2656E	August 22, 2013	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B" which may be downloaded from DAQ's website.

Determinations and Justifications

Changes to the existing permit:

1. Requirement 4.1.1 – revised emission limits for Board Dryer (emission unit EU36), and included emission limits for newly added silos (EU50 and EU52) and feeder bins (EU51 and EU53) based on R13-2656D requirements.
2. Requirement 4.1.9 – newly added silos (EU50 and EU52) and feeder bins (EU51 and EU53) are subject to 45CSR§7-3.7 (reference added).
3. 40 C.F.R 60 Subpart OOO - newly added Vermiculite Silo EU52 and Vermiculite Feeder Bin EU53 are subject to the requirements of this Subpart per §§60.670(a)(1) and (e), because they meet the definition of *storage bin* in §60.671 (they store *nonmetallic mineral* Vermiculite), and they are constructed after August 31, 1983. Per 40 CFR §60.672(f), the silo and feeder bin are exempt from stack PM concentration limits and associated performance testing because the emissions from each storage bin are controlled by separate fabric filters. The silo and bin are, however, required to meet the applicable stack opacity limit of seven (7) percent for dry control devices. Applicable provisions are listed in the following requirements: 4.1.10, 4.2.11, 4.3.3, 4.4.2, 4.5.1, 4.5.2 and 4.5.3. They include: 7% opacity limit and monitoring of baghouses (per 40 C.F.R 60 Subpart OOO, Table 2), testing of fugitive emissions (40 C.F.R 60 Subpart OOO, Table 3), recordkeeping and reporting. Monitoring of baghouses and initial / repeat performance testing for fugitive emissions are applicable because these emission units were constructed after April 22, 2008.
4. Requirement 4.1.17 – a reference was added for new emission units EU50 through EU53 to maintain pressure drop of their baghouses between 0.5 and 6 in. H₂O (in the manner similar for the rest of the baghouses at the plant).
5. New requirements 4.1.18, 4.1.19, 4.2.9 and 4.2.10 were added for Kettles K10 (emission unit EU12) and K20 (emission unit EU13), and Wall Board Dryer (emission unit EU36) based on permit R13-2656D requirements.
6. Testing requirement 4.3.1.1 – revised based on permit R13-2656E requirement 4.3.1.
7. Facility mailing address changed from 7200 Energy Road to 9622 Energy Road by the Marshall County Commission.

Non-Applicability Determinations

1. 40 C.F.R 60 Subpart OOO - newly added Ethylated Starch Silo EU50 and Ethylated Starch Feeder Bin EU51 are not subject to the requirements of this Subpart because they do not meet the definition of *storage bin* in §60.671 (Ethylated Starch is not a *nonmetallic mineral*).
2. 40CFR64 - none of the new emission units (EU50 through EU53) have the potential to emit before controls the applicable regulated air pollutant (PM₁₀) in an amount equal to or greater than 100 TPY, therefore CAM is not applicable. Kettles K10 and K20 emit 14.1 TPY of PM₁₀ each after controls (which equates to 140 TPY before controls at 99% baghouse efficiency), but they are subject to PM emission limitations in Subpart UUU—*National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recovery Units*, therefore they are exempt from requirements of CAM per §64.2(b)(1)(i).

There are no Greenhouse Gas Clean Air Act requirements for this facility because the facility has not made any changes that triggered a PSD permit modification.

Request for Variances or Alternatives

None

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date:	August 28, 2013
Ending Date:	September 27, 2013

Point of Contact

All written comments should be addressed to the following individual and office:

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Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments (Statement of Basis)

N/A